

February 22, 2002

Jeff Ross
Qwest Communications International, Inc.
1801 California, Suite 3800
Denver, CO 80202

Re: Registered Construction and Operation Status,
097-15401-00422

Dear Mr. Ross.:

The application from Qwest Communications, received on December 13, 2001, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.1, it has been determined that the following unit, to be located at 550 Kentucky Avenue, Indianapolis, Indiana, is classified as registered:

- (a) One (1) Cummins / Onan 1850 hp diesel fired emergency generator (internal combustion engine) identified as emission unit 1. This unit was constructed in 1999 and operations began in 2000.

The following conditions shall be applicable:

- (1) Pursuant to an EPA memorandum, dated September 6, 1995, the potential to emit for emergency generators shall be calculated based upon 500 hours of operation.
- (2) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
 - (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.
- (3) Pursuant to the requirements of 326 IAC 2-6, the permittee shall submit an annual emission statement that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30.

The annual emission statement must be submitted to:

Compliance Data Section
Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Compliance Data Group
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

- (4) An authorized individual shall provide an annual notice to the Office of Air Quality and the City of Indianapolis Office of Environmental Services that the source is in operation and in compliance with this registration pursuant to or 326 IAC 2-5.1-2(f)(3)). The annual notice shall be submitted to:

Compliance Data Section
Office of Air Management
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015

and

Office of Environmental Services
Air Quality Management Section, Compliance Data Group
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

no later than March 1 of each year, with the annual notice being submitted in the format attached.

This registration is the first air approval issued to this source. The source may operate according to 326 IAC 2-5.5.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original Signed by Barbara A. Lawrence
Barbara A. Lawrence, Acting Administrator
Office of Environmental Services

ajh

cc: file (2 copies)
Mindy Hahn, IDEM

Registration Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3).

Company Name:	Qwest Communications
Source Address:	550 Kentucky Avenue, Indianapolis, IN 46225
Mailing Address:	1801 California, Suite 3800, Denver, CO 80202
Authorized individual:	Jeff Ross
Phone #:	(303) 672-2937
Registration #:	097-15401-00422

I hereby certify that Qwest Communications' emergency generator is still in operation and is in compliance with the requirements of Registration 097-15401-00422.

Name (typed):
Title:
Signature:
Date:

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services**

**Technical Support Document (TSD) for New Source Construction and
Registration**

Source Background and Description

Source Name:	Qwest Communications
Source Location:	550 Kentucky Avenue, Indianapolis, IN 46225
Mailing Address:	1801 California, Suite 3800, Denver, CO 80202
County:	Marion
SIC Code:	4813
Operation Permit No.:	097- 15401-00422
Permit Reviewer:	Amanda Hennessy

The City of Indianapolis Office of Environmental Services (OES) and the Office of Air Quality (OAQ) have reviewed an application from Qwest Communications relating to the construction and operation of one emergency generator.

Permitted Emission Units and Pollution Control Equipment

There are no permitted emission units existing at this source.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted unit:

- (a) One (1) Cummins / Onan 1850 hp diesel fired emergency generator (internal combustion engine) identified as emission unit 1. This unit was constructed in 1999 and operations began in 2000.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
1	Emergency Generator	approx. 2	0.5	9620	905

Enforcement Issue

- (a) OES and OAQ are aware that equipment has been operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.

- (b) OES and IDEM are reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the operating permit rules.

Recommendation

The staff recommends to the Administrator that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on December 13, 2001.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, page 1).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)*
PM	0.3
PM-10	0.2
SO ₂	1.2
VOC	0.3
CO	2.5
NO _x	12.9

* PTE for emergency generators is calculated at 500 hours per year.

- (a) Since the source wide emissions for NO_x are greater than 10 tons per year but less than 25 tons per year for this new source, section 326 IAC 2-5.1 applies to this new source. This source is a Registration.

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	unclassifiable
SO ₂	maintenance attainment
NO _x	attainment
Ozone	maintenance attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Marion County has been classified as maintenance attainment, attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)

This new source is not subject to this rule since it does not have the potential to emit 10 or more tons per year of any single hazardous air pollutant or 25 tons per year of any combination of hazardous air pollutants.

326 IAC 2-5.1-2 (Registrations)

Since the source wide emissions for NO_x are greater than 10 tons per year but less than 25 tons per year for this new source, section 326 IAC 2-5.1 applies to this new source. PTE was calculated at 500 hours per year since the unit is an emergency generator.

326 IAC 2-5.1-2(Registration Content)

Pursuant to 326 IAC 2-5.1-2 (Registration Content), an authorized individual shall provide an annual notice to the Office of Environmental Services and the Office of Air Quality that the source is in operation and in compliance with this Registration pursuant to state regulation 326 IAC 2-5.1-2(f)(3).

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of NO_x and is located in Marion County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-1 (Nonattainment Area Limitations)

Qwest Communications is not subject to the limits of 326 IAC 6-1 (Nonattainment Area Limitations) for Particulate Matter since the PTE of particulate matter is less than 100 tons per year.

326 IAC 6-3 (Process Operations)

Pursuant to 326 IAC 1-2-59, process weight does not include liquid or gaseous fuels, therefore 326 IAC 6-3-2 does not apply to this unit.

326 IAC 7.1 (Sulfur Dioxide Emission Limitations)

Qwest Communications potential to emit SO₂ is less than 25 tons per year, therefore 326 IAC 7.1 (Sulfur Dioxide Emission Limitations) does not apply.

Conclusion

The operation of this emergency generator shall be subject to the conditions of the attached proposed **New Source Construction and Registration 097-15401-00422**.

Company Name: Qwast Communications
Address City IN Zip: 550 Kentucky Avenue, Indianapolis, IN 46225
OP#: 97-15401-422
Reviewer: AJH
Date: January, 2002

A. Emissions calculated based on heat input capacity (MMBtu/hr)

Emergency Generator Potential to Emit is based on operating 500 hours per year.

Heat Input Capacity
MM Btu/hr

S= 0.4 = WEIGHT % SULFUR

11.8

Emission Factor in lb/MMBtu	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	0.1	0.0573	0.4 (1.01S)	4.4 **see below	0.1	0.85
Potential Emission in tons/yr	0.3	0.2	1.2	12.9	0.3	2.5

**NOx emissions: Based on worst case scenerio emission factor provided by manufacturer 12.6 g/Bhp-hr. This exceeds AP-42.

Emission Factors are from AP 42 (Supplement B 10/96)Table 3.4-1 and Table 3.4-2

1 hp-hr = 7000 Btu, AP42 (Supplement B 10/96), Table 3.3-1, Footnote a.

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)

*No information was given regarding which method was used to determine the PM emission factor or whether condensable PM is included. The PM10 emission factor is filterable and condensable PM10 combined.